UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III – 6th & Walnut Sts.
Philadelphia, Pa. 19106

PPG Industries INC.
Natrium Plant, New Martinsville

SUBJECT: RCRA Inspection–WVD 00 433 6343

DATE: June 25, 1982

FROM: Douglas A. Donor, Environmental Scientist DAD
RCRA Compliance and Superfund (3AW23)

TO: File

Thru: Robert L. Collings
Chief, Water & RCRA Enforcement Section (3RC12)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED AT THIS TIME. 5/20/81 inspection

INSPECTION FACT SHEET

COMPANY NAME: PPG Industries
PLANT NAME: Natrium Plant

ID # WVD004336343

ADDRESS: Route 2 North
P. O. Box 191
New Martinsville, WV 26155

TYPE OF FACILITY: GEN, TSDF

COMPANY CONTACT: Warren E. Dean

PHONE: (304) 455-2200

PURPOSE: Compliance Evaluation Inspection (CEI)

APPLICABLE REGULATIONS: 40 CFR Parts 260-265 (FR February 26 and May 19, 1980)

LIST OF CHEMICALS: D000, D001, D002, D003, F001, K073, K085, P022, U013, U019, U037, U070, U071, U072, U135, U151

DATE INSPECTED: May 20, 1981

INSPECTORS:
(1) Ken Hilsbos, West Virginia Division of Water Resources; Designated EPA Representative
(2) Marie Cinquegranna, West Virginia Division of Water Resources

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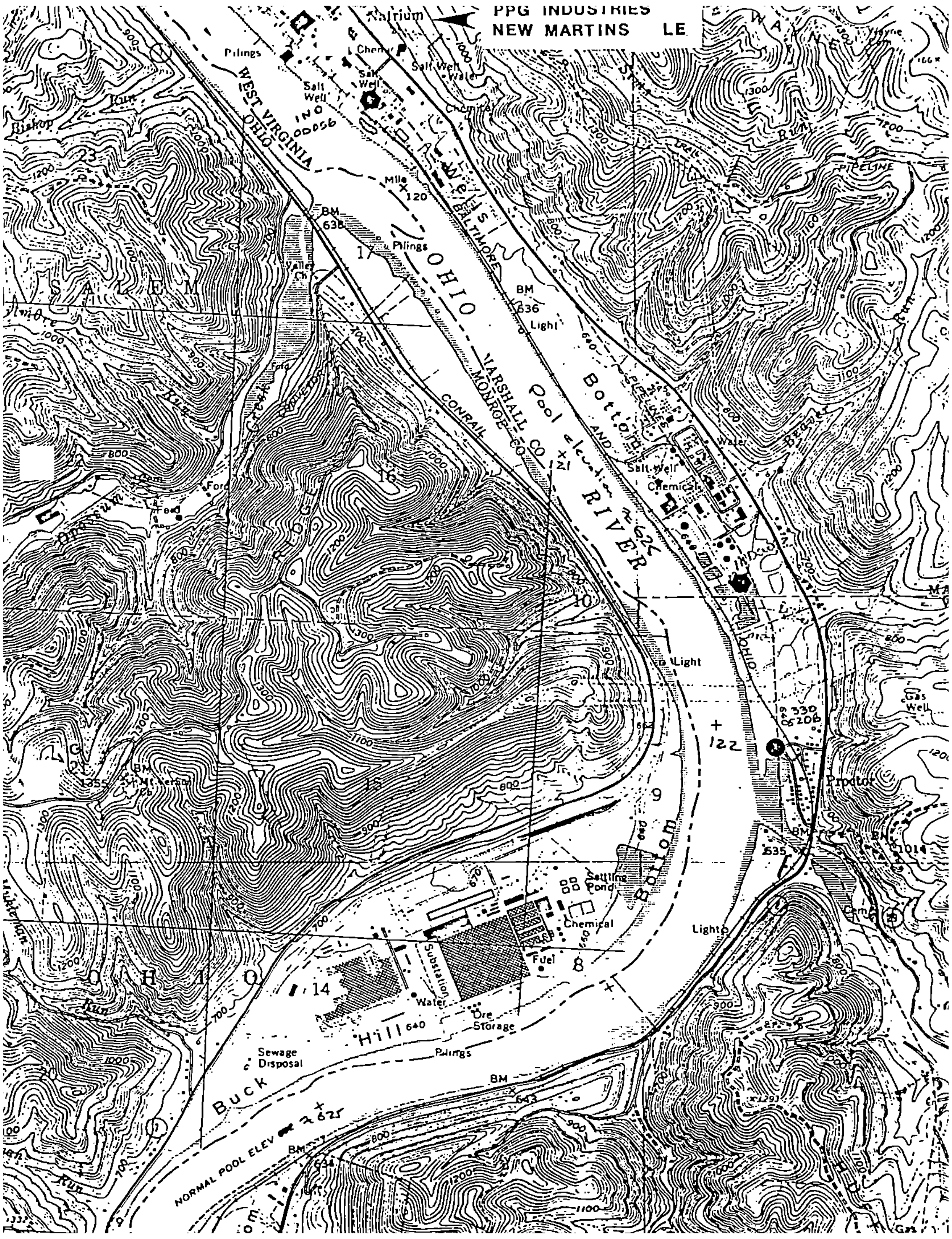
PPG INDUSTRIES
NEW MARTINS LE
Natrium
Pilings
Salt Well
Chemical
WEST VIRGINIA
OHIO
Bishop Run
Mile 120
BM 638
Pilings
OHIO
BALTIMORE
SALEM
BM 636
Light
MARSHALL CO
MONROE CO
CONRAIL
Pool elevation 626
RIVER
Bottom
AND
Water
Ford
Creek
Proctor
Gas Well
BM 1355 Mt Vernon Ch
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Chemical
Substation
Fuel
Water
Ore Storage
Hill 640
Sewage Disposal
Pilings
Buck
BM 643
NORMAL POOL ELEV 625
BM 634
Run
Pipeline
Cem
BM 1014
BM 635

TRIP REPORT

TO: Robert Jelacic, Subtitle C Inspection Coordinator

FROM: Ken Hilsbos, Inspector

RE: CEI - PPG Industries, Inc.: Natrium Plant (WVD004336343) - May 20, 1981

DATE PREPARED: July 28, 1981 (from June 1, 1981 draft)

Marie Cinquegranna and this inspector (Ken Hilsbos) arrived at the PPG Industries, Inc. Natrium Plant, New Martinsville, WV, at about 9:30 a.m. The Charleston office of the Ground Water/Hazardous Waste Branch had arranged the inspection in advance. We met Bob Mitchell, Environmental Control Specialist.

Mr. Mitchell acknowledged our intent to inspect under Section 3007 (a) of the Resource Conservation and Recovery Act and consented to the inspection. This inspector showed his EPA credentials. The inspectors explained that Ms. Cinquegranna was not yet a designated EPA representative but was training to qualify for designation. We said she would accompany this inspector only if PPG Industries, Inc. consented. The company consented to Ms. Cinquegranna's presence. PPG Industries, Inc. did not claim confidentiality for any of this information.

The following PPG Industries, Inc. personnel joined for these portions of this inspection: Perry Blaire, of the Environmental Control Group, for parts of the morning records inspection session; James A. Fauber, Director of Employee Relations, for inspection of and safety equipment records; Jim Bronchik, Training Supervisor, for inspection of training and safety equipment records; John F. Knoop, Area B Superintendent, for inspection of Area B records and drum storage; Finley Amos, Organics Shipping Foreman; for inspection of Area B, including records; and Ken Walborn, Chlorine Area Superintendent, for tracifier storage (tank car) and treatment and lead sludge

cake storage and treatment.

In the morning we inspected records in the Environmental Control Group office. In the afternoon we inspected Subtitle C areas of the plant and inspected records at the Employee Relations office.

Mr. Mitchell said the facility receives no hazardous waste. Lead waste is stored in plastic-lined boxes under short-term rules. Other hazardous wastes are stored under long-term rules in drums, a tank car, and a double-lined NPDES surface impoundment.

The inspection raised the following questions:

1. What will monitoring requirements be, specifically? (From B, #14F) (Mitchell)

2. Participants did not pin down question #7 on surface impoundments checklist (ignitable or reactive wastes) enough to answer it.

3. Is PPG Industries, Inc. incorrect in identifying their lead waste as both D008 and D003 on their manifests? (this inspector)

4. Is the fact sheet in error in identifying as D000 the waste which PPG Industries, Inc. identifies as D008 on their manifests? (this inspector)

Compliance Evaluation

The inspection revealed few deficiencies.

Area B and STB Warehouse (in the Marshall Plant) contained some rusty drums; a few drums had dents. Mr. Amos's explanation for the one bulged drum indicated no problem. Mr. Amos said the open drums (i.e. with tops, but with screw-lids off) were contaminated empties.

There were a variety of odors in the treatment and storage areas.

The secondary containment for the tracifier treatment area looked leaky, however, all or most of any small spillage would go to the sump. The tracifier waste storage (tank car) had no secondary containment. Secondary containment for Area B (waste oil from carbon disulfide production) had no impermeable liner. Run-off all goes to treatment, according to Mr. Mitchell. Kenneth Hilsbos.

RCRA CHECKLIST FOR INSPECTION OF GENERATORS

RO USE

Inspection file No. _____

Reviewer _____

Date reviewed: _____

Form "A"

Name of Facility: LG Industries, Inc.: Natrium Plant

Address: P.O. Box 191

New Martinsville WV 26155

EPA Generator ID Number: WVD004336343

Facility Inspection Representative: Bob Mitchell

Title: Environmental Control Specialist

Telephone Number: 304/455-2200

Pert. Regs. 40 C.F.R. Part:

1. Please provide a brief narrative explaining the type of work activity that occurs at the generator.

Manufacture chlorine, caustic, ammonia, chlorobenzene, CS_2, Na_2S, NaHS.

2. Does the generator dispose of its wastes....

A. On-site

(Circle one or both)

(B.) Off-site

Note: if on-site, then checklist for both a generator and TSD facility must be completed if on-site more than 90 days.

3. What is the amount of hazardous waste (in kilograms) produced by the generator facility in a month? ~ 41,000 in a year? 492,000
(If the amount is less than 1,000 kg/month, then the facility qualifies as a small generator and Form C should be completed instead of Form A.)

4. What categories of hazardous wastes result from the generator's facility? Please circle:

A. Ignitable wastes (Yes) No

B. Reactive wastes Yes No

C. Corrosive wastes (Yes) No

D. EP Toxic wastes (Yes) No

E. RCRA Listed Waste (Y)

~~ATTACHMENT A~~

262.12

5. Is the genera presently...

Circle

A. Treating hazardous waste? (Yes)

B. Storing hazardous waste? > 90 days & < 90 days (Yes)

C. Disposing hazardous waste? Yes

Note: if the generator performs any of the activities noted in Question 5, then the inspector must complete Form B, entitled "RCRA Checklist for inspection of hazardous waste treatment, storage and disposal facilities."

262.20

6. Is a manifest system currently in operation at the generator's facility so that offsite shipment of hazardous wastes can be tracked? (Yes)

7. Please inspect the generator's manifest for the following information:

A. Is the TSD facility which receives a generator's hazardous waste identified by name, address, and EPA ID number? (Yes) N

262.20(c)

B. Is an alternative facility designated in case of an emergency? Yes

C Is a serialized manifest document number included on the form? (Yes) N

262.20(a)(2)

D Is the generator's name, address, telephone number and EPA ID number included on the form? (Yes) N

262.20(a)(3)

E. Is the name and identification number of each transporter included on the form? (Yes) N

F. Is a description of the generator's hazardous waste to be treated, stored, or disposed included on the manifest? (Yes) N

G. Is the quantity of each waste by units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form? (Yes) N

H. Is the following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature?

"This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the available (applicable) regulations of the DOT and EPA." (Yes) No

262.22

I. Are there adequate copies of the manifest available for generator, transporter, and TSD's? (Yes) N

8. Is hazardous waste being stored on-site by the generator for less than 90 days? Some > 90 days, some < 90 days. (Yes) No

i.e. only 1 ad.

If so,

262.34(a)(3)

A. Is the date accumulation of waste began clearly marked on each storage container? (Yes) No

262.34(a)(2) B. Are storage containers in good condition, i.e., no corrosion, leaking, or structural deformations? *Did not look at lead storage inspection records.* Yes N

262.34(a)(4) C. At the time of accumulation, are the storage containers clearly labeled as containing a particular hazardous waste in accordance with DOT regulations? Yes N

9. Does the generator have an established contingency plan to deal with emergencies that may impact hazardous waste currently in storage at the facility? Yes N

265.16(a) 10. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? Yes No

265.16(d) 11. Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job? Yes No

265.16(d)(2) 12. Does the generator facility have on record a written position description for each job title noted in Question #11? Yes No

265.16(d)(3) 13. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #11? Yes No

Ask Employee Relations

265.32(a) 14. *Does the generator facility have installed the following equipment:

A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? Yes No

B. A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.? NORIMAC Yes No

C. Fire control equipment and an adequate supply of fire fighting water or fire supression chemicals? Yes No

265.35 15. *Does the generator facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? Yes No

265.50 16. Does the facility have a contingency plan which contains the following elements: Yes No

265.52(c) A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? Yes No

265.52(d) B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? NORIMAC Yes No

265.52(d) C. A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? (Yes) N

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

265.52(e) D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? (Yes) N

265.52(f) E. *An evacuation plan for the generator facility if Management believes such a plan is a definite requirement for their particular generator facility. (Yes) N

17. Please provide detailed comments on specific problems encountered during the inspection For instance, industry requests for clarification of specific RCRA rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

Inspector's Name: KEN HILSBOS

Title: RCRA INSPECTOR

Agency: WV DNR Water Resources

Office location: FAIRMONT

Date of Inspection: 5/20/81

Inspector's Name: MARIE K. CINAVEGRANNA

Title: CO-OP ENGINEER

Agency: WV DNR WATER RESOURCES

Office location: CHARLESTON

Date of Inspection: 5/20/81

RCRA CHECK LIST FOR INSPECTION OF TSD FACILITIES

RO USE

Name of Facility: PPG

Address: _____

_____

EPA TSD ID Number: _____

Facility Inspection Representative: _____

Title : _____

Telephone: _____

Inspection File No. _____

Reviewer _____

Date reviewed _____

Form "B"

SITE CHARACTERIZATION (Please denote if the facility presently treats, stores, or disposes of hazardous waste. Also, mark the appropriate sub-category that occurs at the particular facility.)

TREATER

- ✓ Filtration
- ___ Incineration
- ___ Thermal Reduction
- ___ Recycling/Recovery
- ✓ Chem/Phys/Bio Treatments
- ___ Waste Oil
- ___ Reprocessing
- ___ Solvent Recovery
- ___ Other _____

STORER

- ___ Open Pile
- ✓ Surface Impoundment
- ✓ Drum
- ___ Above ground tank(s)
- ___ Below ground tank(s)
- ✓ Other Tank car, boxes (plastic lined)

DISPOSER

- ___ Landfill operation
- ___ Land treatment
- ___ Surface Impoundment
- ___ Incineration
- ___ Other _____

INSPECTION PROCEDURE

1. Does the facility generate hazardous wastes? (Yes) No

   Note: Please complete the generator's checklist if TSD facility generates hazardous wastes which are disposed off-site.

265.13(b) 2. Does the facility have in place a waste analysis plan? (Yes) No

   If so,

265.13(a) A. Does the plan enable facility personnel to identify hazardous wastes being handled by the facility? (Yes) No

265.13(c) B. Does the plan enable facility personnel to confirm that wastes actually received at the TSD facility are the wastes indicated on the generator's manifest form? NA Yes No

3. *Does the TSD facility have a 24-hour surveillance system which monitors and controls entry to the active portion of the facility? (Yes) No

   All fenced. 24-hr. guard at main gate. Other gates locked when not guarded

A. If not, does the facility have an artificial or natural boundary which surrounds active portions of the facility and, NA Yes

B. A means to control entry at all times, i.e., gates, attendants, locked entrances, etc.? Yes

265.14 (c) 4. *Does the TSD facility have a restricted access sign posted at each entrance to the active portion of the facility? (An example would be: "Danger - Unauthorized Personnel Keep Out!" Yes

If so,

A. Is the sign legible from a distance of 25 feet? Yes

B. Is the sign in English or any other foreign language predominant to the geographical area? Yes

2 15(d)
2 15(b) 5. Does the TSD facility have an inspection log and a written schedule for inspecting all emergency equipment, security devices, and operating and structural equipment, important to the prevention, detection or response to environmental/human health emergencies? Yes

265.16(a) 6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? Yes

265.16(d) 7. Does the TSD facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job? Yes N

265.16(d)(2) 8. Does the TSD facility have on record a written position description for each job title noted in Question #6? Yes N

2 6(d)(3) 9. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #6? Yes N

265.32(a) 10. *Does the TSD facility have installed the following equipment:

A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? Yes N

B. A device at the scene of hazardous waste TSD operations capable of summoning emergency assistance from Police, Fire departments, etc.? Yes N

C. Fire control equipment and an adequate supply of fire fighting water or fire supression chemicals? Yes N

265.35 11. *Does the TSD facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? Yes N

265.50 12. Does the facility have a contingency plan which contains the following elements:

265.52(c) A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? (Yes) No

265.52(d) B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? (Yes) No

265.52(d) C. A listing of names, addresses, and phone numbers of the TSD facility emergency response coordinators? (Yes) No
Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

265.52(e) D. A list of appropriate emergency equipment necessary to cope with emergencies at the TSD facility? (Yes) No

265.52(f) E. *An evacuation plan for the TSD facility if Management believes such a plan is a definite requirement for their particular TSD facility? (Yes) No

265.55 13. Does the facility have at all times at least one employee either on-call or on the site who is responsible for coordinating all emergency response measures? (Yes) No

If so, please complete below:

Name: _____

Title: Guard (at main gate)

Telephone Number: 455-2200 (x3361 during bus. hrs. — Env. Con. Grou

265.73 14. Does the TSD facility have a written operating record which contains the following information:

265.73(b)(1) A. A description and the quantity of each hazardous waste received and the method and date of treatment, storage or disposal? NA Yes No

265.73(b)(2) B. The location of each hazardous waste within the facility and the quantity at each location? Drums inventory: weekly. (Yes) No

265.73(b)(3) C. Detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility? NA Yes No

265.73(b)(4) D. Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? NA Yes No

265.73(b)(5) E. Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas? (Yes) No

265.73(b)(6) F. Detailed monitoring, testing, and analytical data to insure compliance with the regulations? Yes (No)

Plan to monitor groundwater at mercury pond beginning on or before 11/19/81. 7 Wells have been drilled. Sampled once.

15. Have the TSD facility operators initiated the preparation of written closure and ~~post-closure~~ plans in order to meet the May 1981 target date for implemmntation of these requirements? (Yes) No

265.71 16. Does the TSD facility receive hazardous waste from off-site generators? Yes (No)

If yes, are the following procedures implemented:

A. Manifest copies are signed and dated Yes No

B. A copy is given to the transporter Yes No

C. A copy is sent to the generator Yes No

D. A copy is returned and filed at the TSD facility Yes No

Note: These requirements do not pertain to onsite facilities unless such facilities also receive hazardous wastes from off-site sources.

265.90 17. Has the owner or operator implemented a groundwater monitoring program if surface impoundments, landfills or land treatment technologies are utilized at the facility? See #14F. Yes (No)

Note: Plan not required until one year after effective date of regulations.

(18) The inspector should check for the following conditions at the TSD facility:

A. Open fires — Tracifier treatment & tank car storage: strong, bity organic odor, probably from nearby process(es). Yes (No)

B. Fumes or gases — Lead filtration: Slight H2S odor, possibly from process. Slight odor in Area B (drum storage), probably from nearby ~~drum~~ RA process. (Yes) No

C. Leaks or corrosion in containers or other storage structures — Area B - Some drums slightly rusty. (Yes) No

D. Leachate to receiving streams Yes (No)

E. Malfunction of equipment Yes (No)

F. Bulging drums — Area B — One bulged drum; F. Amos said from water, now empty but contaminated. (Yes) No

G. Excessive heat generation from storage facilities, lagoons, storage piles, etc. — STB Warehouse in Redstone Plant: Some drums rusty, slightly dented. Yes (No)

19. Please provide detailed comments on specific problems encountered during the TSD facility inspection. For instance, industry requests for clarification of specific rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

Inspector's Name: KEN HILSBOS

Title: _____

Agency: _____

Office location: _____

Date of Inspection: 5/20/81

Inspector's Name: MARIE K. CINQUEGRANNA

Title: _____

Agency: _____

Office location: _____

Date of Inspection: 5/20/81

RCRA Checklist for Chem l, Physical and Biological Tr ment

(Subpart Q Part 265.40 - "General Operating Requirements"

R.O. USE

Inspection file No:

Name of Facility: PPG

Address:

Reviewer:

EPA Generator ID Number:

Date Reviewed:

Facility Inspection Representative:

Title:

Form "Q"

Telephone Number:

The questions contained in this checklist apply to owners and operators of facilities which at hazardous wastes by chemical, physical, or biological methods in other than tanks, face impoundments and land treatment facilities except as Section 265.1 provides otherwise.

Pert. Regs. 40 C.F.R. Part:

Tracifier treatment, K073 lead filtration.

265.401(b) 1. Are all treatment processes or equipment in good condition, i.e., not showing signs of leakage, corrosion or any other deterioration? treat. Tracifier Pipes rusty. Secondary containment looks leaky. Yes (No) Leaked would go to ground.

265.401(c) 2. Are treatment processes or equipment with continuous inflow of hazardous waste equipped with a means to stop this inflow? (e.g., waste feed cutoff system or bypass system to a standby containment device) Batch; attended. NA Yes No

2 02(1) & (2) 3. Are waste analyses performed or written documentation obtained before placing a substantially different hazardous waste into treatment processes or equipment? (Yes) No
i.e. Do, not change, but would analyze, etc., if they were to do so.

4. Is this information recorded in the facility's operating record? Yes No NA

265.403(a) (1) 5. Are daily inspections conducted for discharge control equipment (e.g., bypass systems, waste feed cut-off systems, drainage systems and pressure relief systems)? NA Yes No

265.403(a) (2) 6. Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day? (Yes) No

265.403(a) (3) 7. Are construction materials of the treatment process or equipment and immediate surrounding area inspected weekly for signs of leakage, corrosion or any other deterioration? (Yes) No

8. Are the results of these inspections recorded in an inspection log or summary? Lead filtration – NA (Yes) No

9. Are ignitable or reactive wastes placed in a treatment process? If so, Yes (No)

265.405(a)(1) A. Are the wastes treated, rendered, or mixed before or immediately after placement in the treatment process or equipment so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive wastes under Section 261.21 or 261.23 of the RCRA regulations? Yes No

265.405(a)(1) B. Are the wastes treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react? Yes No

10. Are incompatible wastes kept from being placed in the same treatment process or equipment? (Yes) No

Inspector's Name: Kenneth Heliker

Title: _____

Agency: _____

Office Location: _____

Date of Inspection: 5/20/91

Inspector's Name: MARIE K. CINQUEGRANNA

Title: _____

Agency: _____

Office Location: _____

Date of Inspection: _____

RCRA Checkl for Surface Impoundments

(Subpart K Section 265.222 "General Operating Requirements"

R.O. USE

Inspection file No

Name of Facility: PPG

Address:

Reviewer:

EPA Generator ID Number:

Date Reviewed:

Facility Inspection Representative:

Title:

Form "K"

Telephone Number:

The questions contained in this checklist apply to owners and operators of facilities that use surface impoundments to treat, store, or dispose of hazardous waste, except as Part 265.1 provides otherwise. Mercury pond.

ND = Not determined.

Pert. Regs. 40 C.F.R. Part:		
265.222	1. Is 2 ft. of freeboard maintained in the surface impoundment?	(Yes) No
265.223	2. Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity?	(Yes) No
265.225(a) (1) & (2)	3. Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment? i.e. Do not change, but would analyze, etc., if they did so.	(Yes) No
265.226(a) (1)	4. Is the freeboard level inspected at least once each operating day?	(Yes) No
265.226(a) (2)	5. Is the surface impoundment, including dikes and vegetation, inspected once per week to detect leaks or deterioration or failures in the impoundment?	(Yes) No
	6. Are the results of these inspections recorded in an inspection log or summary?	(Yes) No
265.229(a)	7. Are ignitable or reactive wastes stored in a surface impoundment: If so, K106 only	ND Yes No
265.229(a) (1)	a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under parts 261.21 or 261.23 of the RCRA regulations?	ND Yes No

265.230	b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided?	NA Yes No

Inspector's Name: Kenneth Hulsbon

Title: _____

Agency: _____

Office location: _____

Date of Inspection: 5/20/81

Inspector's Name: MARIE K CINQUEGRANNA

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

RCRA Checklist for : and Management of Containers

(Subpart I Section 265.170 - "General Operating Requirements"

R.O. USE

Inspection file No

Reviewer:

Date Reviewed:

Form "I"

Name of Facility: PPG

Address:

EPA Generator ID Number:

Facility Inspection Representative:

Title:

Telephone Number:

The questions contained in this checklist apply to owners and operators of all hazardous waste ilities that store containers of hazardous waste, except as Section 265.1 provides otherwise

Pert. Regs. 40 C.F.R. Part:	Drums, tank car, boxes. 4 locations		
265.171	1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? Area B - Some drums slightly rusty STB warehouse in Marshall Plant: Some drums rusty, slightly dented.	Yes	(No)
265.171	2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes?	(Yes)	No
265.173(a)	3. Are all containers holding hazardous waste kept closed during storage? Area B - Some drums open. F. Amos said empty, contaminated with solid S_2.	Yes	(No)
2 174	4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?	(Yes)	No
265.15(d) 265.15(b)	5. Is an inspection log maintained? (See question #5 of TSD checklist.)	(Yes)	No
265.176	6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?	(Yes)	No
265.177(a)	7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.)	Yes	(No)
265.177(c)	8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? No incompatible wastes.	NA Yes	No

Form "I"

Inspector's Name: Kenneth Helsbe

Title: _____

Agency: _____

Office location: _____

Date of Inspection: 5/20/81

Inspector's Name: MARIE K. CINQUEGRANNA

Title: _____

Agency: _____

Office location: _____

Date of Inspection: 5/20/81

HAZARDOUS WASTE MANIFEST

PPG INDUSTRIES

0370
Manifest Document Number

Instructions: Generator: Retain green copy
Transporter #1: Retain canary copy
Transporter #2: Retain pink copy
T/S/D Facility: Retain golden rod copy
Return white original and white Certificate of Waste Management to Generator
Additional copy: blue copy

Generator _____
Address _____
City _____ State _____ Zip _____
Phone _____ EPA I.D.# _____

Emergency Response System 304-843-1300 Information on spills, property damage or injury involving PPG materials.

Transporter #1 _____
Address _____
City _____ State _____ Zip _____
Phone _____ EPA I.D.# _____

TREATMENT STORAGE DISPOSAL Facility _____
Address _____
City _____ State _____ Zip _____
Phone _____ EPA I.D.# _____

Transporter #2 _____
Address _____ IF NECESSARY
City _____ State _____ Zip _____
Phone _____ EPA I.D.# _____

No. Units & Container Type	Weight or Volume	RQ	D.O.T. Proper Shipping Name (no abbreviations)	D.O.T. Hazard Class (no abbreviations)	D.O.T. I.D. #	EPA Hazardous Waste #

PLACARDS REQUIRED

Special Handling Instructions and Comments _____

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency and applicable state and local governments.

GENERATOR
SIGNATURE _____ DATE _____

This is to certify acceptance of the hazardous waste shipment. (Transporter's signature indicates applicable D.O.T. placards were offered.)

TRANSPORTER #1
SIGNATURE _____ DATE _____

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #2
SIGNATURE _____ IF NECESSARY DATE _____

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TREATMENT STORAGE DISPOSAL Facility
Signature _____ DATE _____

CERTIFICATE OF WASTE MANAGEMENT
ATTACHED ..... ☐
TO BE RETURNED . ☐

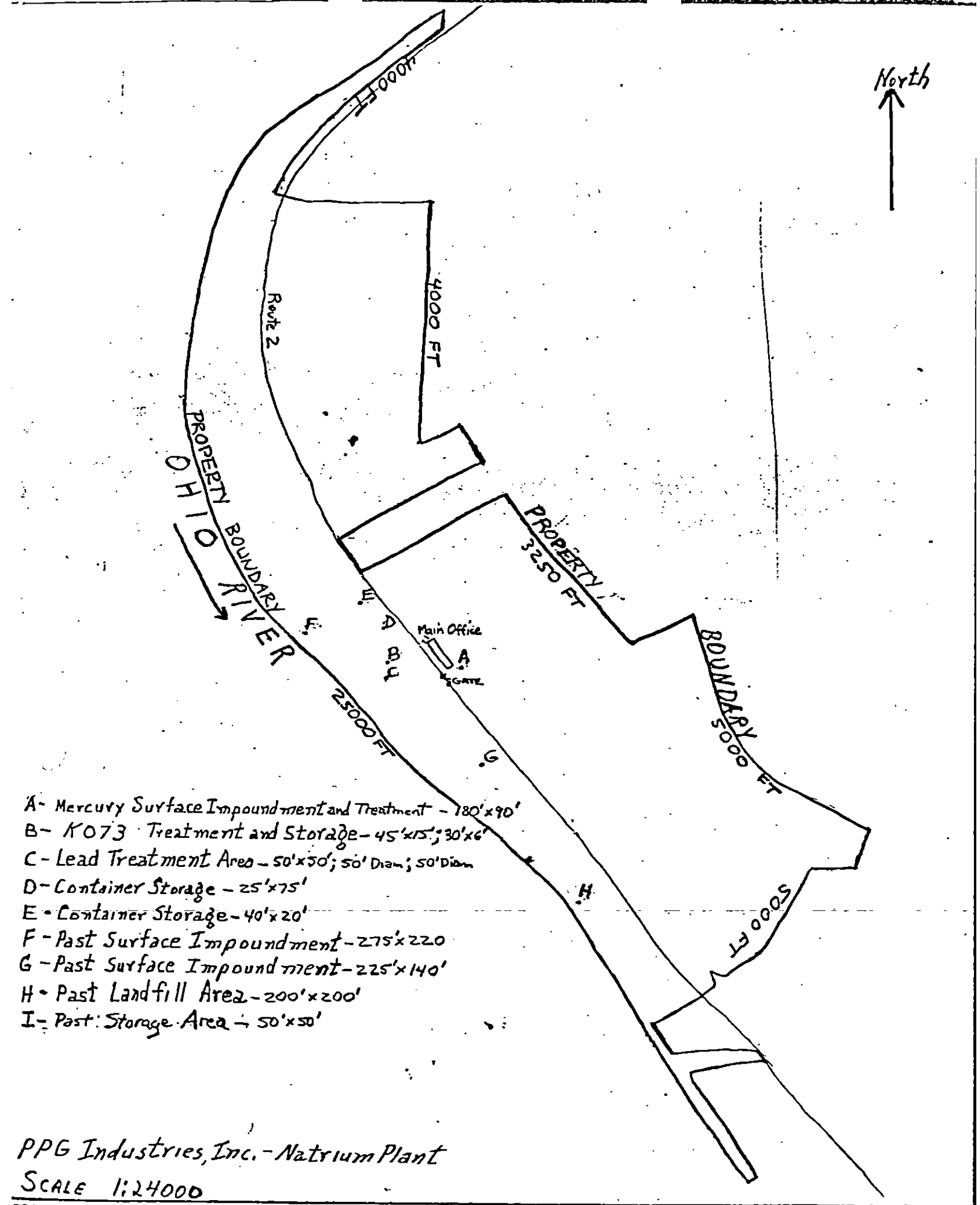
FORM 5014 12-80

ORIGINAL — RETURN TO GENERATOR

Site Map

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*



A- Mercury Surface Impoundment and Treatment - 180'x90'
B- K073 Treatment and Storage - 45'x15'; 30'x6'
C- Lead Treatment Area - 50'x50'; 50' Diam; 50' Diam
D- Container Storage - 25'x75'
E- Container Storage - 40'x20'
F- Past Surface Impoundment - 275'x220
G- Past Surface Impoundment - 225'x140'
H- Past Landfill Area - 200'x200'
I- Past Storage Area - 50'x50'

PPG Industries, Inc. - Natrium Plant

SCALE 1:24000

PPG INDUSTRIES

- ENCLOSED 1981 GROUNDWATER MONITORING DATA

WASTE	AMT. (THEIR REPORT)	AMT. (OUR REPORT)
F001 (S02)	105,170 (P)	NOT LISTED
D001 (S01)	1200 (P)	NOT LISTED
D001 (S01)	2200 (P)	NOT LISTED
K106 (S04)	175000 (P)	AMT. NOT PROPERLY ADDED

TABLE I

FIRST 1983 SEMIANNUAL WELL SAMPLING DATA VERSUS 1982 BACKGROUND WELL

	1982 BACKGROUND WELL		FIRST 1983 SEMIANNUAL WELL SAMPLING RESULTS					
			GM-0 BACKGROUND REGULAR SAMPLE			GM-0 RESAMPLE		
Parameter	Variance	Mean	Variance	Mean	SSI[1]	Variance	Mean	SSI[1]
pH	0.075	7.12	0.0025	7.63	Yes	0.0079	7.075	No
Spec. Cond.	2212	618	2.667	528	No	1250	612.5	No
TOC	1.467	3.37	0.0333	4.20	Yes	1.896	3.59	No
TOX	1225	49	91.66	102.5	Yes	50	52.5	No
			GM-1 DOWNGRADIENT REGULAR SAMPLE			GM-1 RESAMPLE		
pH			0.0025	7.33	No			
Spec. Cond.			2.25	1087	Yes	2857	1050	Yes
TOC			0.020	13.4	Yes	4.55	10.59	Yes
TOX			33.33	55	No			
			GM-2 DOWNGRADIENT REGULAR SAMPLE			GM-2 RESAMPLE		
pH			0.0358	7.23	No			
Spec. Cond.			4.667	1293	Yes	2679	1262.5	Yes
TOC			0.4225	11.78	Yes	1.46	5.83	Yes
TOX			91.67	37.5	No			
			GM-6 DOWNGRADIENT REGULAR SAMPLE			GM-6 RESAMPLE		
pH			0.00333	7.15	No			
Spec. Cond.			0.9167	1028	Yes	2679	962.5	Yes
TOC			0.0892	10.03	Yes	1.67	9.36	Yes
TOX			33.33	25	No			

[1] Statistically significant increase (or pH decrease) according to 40 CFR 265.93(b).

TABLE II

SECOND 1983 SEMIANNUAL WELL SAMPLING DATA VERSUS 1982 BACKGROUND WELL

	SECOND SEMIANNUAL WELL SAMPLING RESULTS														
	1982 BACKGROUND WELL			GM-0 BACKGROUND			GM-1 DOWNGRADIENT			GM-2 DOWNGRADIENT			GM-6 DOWNGRADIENT		
Parameter	Variance	Mean		Variance	Mean	SSI[1]	Variance	Mean	SSI[1]	Variance	Mean	SSI[1]	Variance	Mean	SSI[1]
pH	0.075	7.12		0	7.0	No	0	7.5	Yes	0	7.1	No	0	7.4	Yes
pH Resample							.0025	6.975	No				.01333	6.9	No
Spec. Cond.	2212	618		33.67	392.5	No	100.92	666.3	Yes	167	825.5	Yes	25	626.5	No
TOC	1.467	3.37		0.15	5.65	Yes	0.27	18.15	Yes	0.0667	15.06	Yes	0.06	10.7	Yes
TOX	1225	49		66.67	40	No	25	22.5	No	33.33	35	No	-- Bad Sample --		

[1]Statistically significant increase (or pH decrease) according to 40 CFR 265.93(b).

TABLE III

40CFR265.94(a)(2)(iii) GROUNDWATER SURFACE ELEVATIONS IN 265.92(e)

GROUNDWATER SURFACE ELEVATIONS

(Relative to Mean Sea Level, Feet)

					First 1983		Second 1983	
	11/81	3/82	6/82	9/82	Semiannual	SA Resample	Semiannual	SA Resample
GM-1	612.3	611.1	610.9	611.6	611.9	612.6	612.7	613.0
GM-2	623.6	622.5	621.3	622.2	622.5	620.3	620.3	(1)
GM-6	631.1	642.4	636.7	633.0	653.7	622.6	622.0	624.3

(1) Resample was not necessary.

ATTACHMENT 1: Results of analysis of ground water samples from PPG Surface Impoundment, Natrium, WV

Chemical Analyses

(Analyses in mg/l unless otherwise stated)

Parameter	Sampling Point GM-O	GM-1	GM-6
TOC	2	12	N.T.F.
Chloride	27	27	N.T.F.
Sulfate	121	1	N.T.F.
*Phenolics	1	4	N.T.F.
*Arsenic	< 2	20	3
Lead	< .01	.03	.04
Barium	.06	1.2	.24
Cadmium	.001	.002	.003
*Mercury	< .1	.23	< .1

*Analyses in ug/l
N.T.F. = Not Tested For

(Analyses in ug/l)

Parameter	Sampling Point Field Blank	GM-O	GM-1	GM-6
Methylene Chloride	N.D.	1.78	10	11.1
1,2-Dichloroethene	N.D.	N.D.	25.4	53.4
1,1,1-Trichloroethane	N.D.	N.D.	.688	N.D.
1,1,2-Trichloroethane	N.D.	N.D.	11.0	24.5
Bromoform	N.D.	N.D.	3.40	5.91
Tetrachloroethene	N.D.	51.0	28.9	26.0
Chloroform	N.D.	N.D.	.916	1.60
Carbon Tetrachloride	N.D.	N.D.	1.27	2.12
Trichloroethene	N.D.	7.91	10.7	24.2
Benzene	N.D.	N.D.	4.10	7.0
1,4-Dichlorobenzene	N.D.	N.D.	5.0	8.0
1.2-Dichlorobenzene	N.D.	N.D.	10.1	15.7
Volatiles	N.D.	N.D.	N.D.	N.D.
Aromatics	N.D.	N.D.	N.D.	N.D.

N.D. - None Detected
Samples collected on August 3, 1983

TABLE I

COMPARISON OF 1983 DOWNGRADIENT WELLS VS. 1982 BACKGROUND WELL

	1982 BACKGROUND WELL		1983 DOWNGRADIENT WELL					
			GM-1 Regular Sample			GM-1 Resample		
Parameter	Variance	Mean	Variance	Mean	SSI[1]	Variance	Mean	SSI[1]
pH	0.075	7.12	0.0025	7.33	No			
Specific Cond.	2212	618	2.25	1087	Yes	2857	1050	Yes
TOC	1.467	3.37	0.020	13.4	Yes	4.55	10.59	Yes
TOX	1225	49	33.33	55	No			
			GM-2 Regular Sample			GM-2 Resample		
pH			0.0358	7.23	No			
Specific Cond.			4.667	1293	Yes	2679	1262.5	Yes
TOC			0.4225	11.78	Yes	1.46	5.83	Yes
TOX			91.67	37.5	No			
			GM-6 Regular Sample			GM-6 Resample		
pH			0.00333	7.15	No			
Specific Cond.			0.9167	1028	Yes	2679	962.5	Yes
TOC			0.0892	10.03	Yes	1.67	9.36	Yes
TOX			33.3	25	No			

[1] Statistically significant increase (or pH decrease) according to 40 CFR 265.93(b).

40 CFR 265.94 (a)(2)(iii) Groundwater Surface Elevations in 265.93 (f)

Groundwater Surface Elevations

(Relative to Mean Sea Level, Feet)

	11/81	3/82	6/82	9/82
GM-1	612.3	611.1	610.9	611.6
GM-2	623.6	622.5	621.3	622.2
GM-6	631.1	642.4	636.7	633.0

Note: Reference Well GM-0 is northwest of the active impoundment and Wells GM-1, GM-2, and GM-6. It is not an up-gradient well because the uppermost aquifer does not occur up-gradient of the impoundment and monitoring wells. There is no means of measuring the groundwater surface elevation at Well GM-0, which is in continuous operation.

40 CFR 265.94 (a)(2)(ii) Value of Parameters in 265.92 (b)(3) for Each Groundwater Monitoring Well

Well No. GM-0 (Reference Well)

	1/4/82	5/10/82	8/3/82	11/15/82	Arithmetic Mean	Variance
pH	8.1, 7.2 7.1, 7.1	7.0, 7.0 7.0, 7.0	6.9, 7.1 7.1, 7.1	7.2, 7.0 7.0, 7.0	7.1	.01
Specific Conductance, μ mho	760, 630 620, 630	600, 600 600, 600	570, 571 570, 570	644, 652 633, 634	618	1640
Total Organic Carbon, mg/l	4.0, 2.4 2.3, 2.6	1.75, 1.82 1.84, 1.78	4.7, 4.5 4.4, 4.3	4.5, 4.4 4.3, 4.3	3.4	1.71
Total Organic Halogen, μg/l	20, 20 20, 20	100, 70 70, 100	120, 40 70, 50	20, <20 <20, <20	49	1140

Well No. GM-1

	1/4/82	5/10/82	8/3/82	11/15/82	Arithmetic Mean	Variance
pH	7.1, 7.1 7.1, 7.1	7.4, 7.4 7.3, 7.3	7.5, 7.3 7.3, 7.3	7.1, 7.1 7.2, 7.2	7.25	0.02
Specific Conductance, μ mho	1100, 1000 1010, 1100	900, 900 900, 900	966, 966 948, 944	1075, 1073 1065, 1065	995	6473
Total Organic Carbon, mg/l	23.8, 26.0 22.6, 21.4	5.86, 5.69 5.88, 5.71	13.5, 14.5 14.9, 14.0	23.4, 23.0 22.5, 22.1	16.6	69.5
Total Organic Halogen, μg/l	<20, <20 <20, <20	180, 170 170, 170	90, 90 70, 90	50, 30 20, 20	77	4913

Well No. GM-2

	1/4/82	5/10/82	8/3/82	11/15/82	Arithmetic Mean	Variance
pH	7.1, 7.1 7.1, 7.1	7.2, 7.2 7.1, 7.1	7.1, 7.1 7.1, 7.1	7.1, 7.1 7.1, 7.1	7.11	.0006
Specific Conductance, μ mho	1380, 1390 1370, 1380	1200, 1200 1200, 1200	1123, 1162 1151, 1165	1282, 1271 1261, 1249	1249	9884
Total Organic Carbon, mg/l	8.9, 20.8 8.3, 13.6	5.58, 5.39 5.38, 5.36	3.5, 3.4 3.3, 3.2	7.6, 7.5 7.4, 7.0	7.3	17
Total Organic Halogen, μg/l	<50, <50 <50, <50	80, 100 90, 100	<20, 20 20, 40	30, <20 30, <20	48	999

Well No. GM-6

	1/4/82	5/10/82	8/3/82	11/15/82	Arithmetic Mean	Variance
pH	7.1, 7.1 7.1, 7.1	7.2, 7.1 7.1, 7.2	7.3, 7.3 7.2, 7.2	7.2, 7.2 7.1, 7.0	7.15	.0045
Specific Conductance, μ mho	850, 850 850, 840	1000, 1000 1000, 1000	833, 811 857, 875	884, 879 901, 898	896	5283
Total Organic Carbon, mg/l	19.1, 21.2 20.9, 21.7	3.61, 3.67 3.73, 3.64	8.9, 9.2 9.2, 9.2	7.3, 7.3 7.4, 7.4	10.2	54
Total Organic Halogen, μg/l	20, 20 20, 20	40, 40 50, 30	20, 30 20, 20	<20, <20 <20, <20	25	95

MERCURY IMPOUNDMENT
FOURTH QUARTERLY MONITORING RESULTS
November 15, 1982
(Concentration in mg/l except as noted)

Parameters	EPA Maximum* Level Standard	MONITORING WELLS GM-0	GM-1	GM-2	GM-6
Arsenic	0.05	<0.005	0.095	0.019	0.011
Barium	1.0	0.074	1.40	0.360	0.650
Cadmium	0.01	<0.010	0.010	0.010	<0.010
Chromium	0.05	<0.010	0.010	<0.010	<0.010
Fluoride	1.4-2.4	2.0	1.0	1.0	1.0
Lead	0.05	0.016	0.045	<0.005	0.240
Mercury	0.002	<0.0005	<0.0005	<0.0005	0.0009
Nitrate (as N)	10	4.1	0.14	0.13	0.29
Selenium	0.01	<0.005	<0.005	<0.005	<0.005
Silver	0.05	0.010	0.010	<0.010	0.010
Endrin	0.0002	<0.0002	<0.0002	<0.0002	<0.0002
Lindane	0.004	<0.004	<0.004	<0.004	<0.004
Methoxychlor	0.1	<0.100	<0.100	<0.100	<0.100
Toxaphene	0.005	<0.005	<0.005	<0.005	<0.005
2,4-D	0.1	<0.100	<0.100	<0.100	<0.100
2,4,5-TP Silvex	0.01	<0.010	<0.010	<0.010	<0.010
Radium 226, 228 pCi/l	5 pCi/l	<1	<1	<1	insuff. sample
Gross Alpha pCi/l	15 pCi/l	<1	<1	5	
Gross Beta pCi/l	4 milli Rem/yr.	<5	<5	<5	
Coliform Bacteria	1/100 ml	<1	60	<1	<1

*Section 265.92(b)(1), Appendix III - EPA Interim Primary Drinking Water Standards, FR Vol. 45, No. 98, 5/19/80 33257

MERCURY IMPOUNDMENT
THIRD QUARTERLY MONITORING RESULTS
August 3, 1982
(Concentration in mg/l except as noted)

Parameters	EPA Maximum* Level Standard	MONITORING WELLS GM-0	GM-1	GM-2	GM-6
Arsenic	0.05	<0.005	0.054	0.012	<0.005
Barium	1.0	0.070	0.832	0.355	0.247
Cadmium	0.01	<0.004	0.063	0.030	<0.004
Chromium	0.05	0.006	0.017	0.010	0.010
Fluoride	1.4-2.4	1.3	2.0	1.0	2.0
Lead	0.05	0.014	0.736	0.003	0.030
Mercury	0.002	0.0001	0.0002	0.0001	0.0003
Nitrate (as N)	10	4.6	0.54	0.50	0.77
Selenium	0.01	<0.005	<0.005	<0.005	<0.005
Silver	0.05	<0.004	0.005	0.005	0.005
Endrin	0.0002	<0.0002	<0.0002	<0.0002	<0.0002
Lindane	0.004	<0.004	<0.004	<0.004	<0.004
Methoxychlor	0.1	<0.10	<0.10	<0.10	<0.10
Toxaphene	0.005	<0.005	<0.005	<0.005	<0.005
2,4-D	0.1	<0.10	<0.10	<0.10	<0.10
2,4,5-TP Silvex	0.01	<0.01	<0.01	<0.01	<0.01
Radium 226, 228 pCi/l	5 pCi/l	<1.6	<1.6	<1.6	<1.6
Gross Alpha pCi/l	15 pCi/l	<2	<2	<2	<2
Gross Beta pCi/l	4 milli Rem/yr	7	<3	3	<3
Coliform Bacteria	1/100 ml	<1	<1	<5	<5

*Section 265.92(b)(1), Appendix III - EPA Interim Primary Drinking Water Standards, FR Vol. 45, No. 98, 5/19/80 33257

MERCURY IMPOUNDMENT
SECOND QUARTERLY MONITORING RESULTS
May 10, 1982
(Concentration in mg/l except as noted)

Parameters	EPA Maximum* Level Standard	MONITORING WELLS GM-0	GM-1	GM-2	GM-6
rsenic	0.05	<.005	0.043	0.009	<.005
arium	1.0	.064	1.1	0.44	0.16
dmium	0.01	<.003	0.026	0.036	0.004
romium	0.05	.011	0.017	0.020	0.014
luoride	1.4-2.4	1.0	1.0	1.0	2.0
ead	0.05	<.005	0.016	0.012	<.005
rcury	0.002	.0002	0.0002	<0.0002	0.0002
trate (as N)	10	6.8	1.5	0.6	1.0
lenium	0.01	<.005	<.005	<.005	<.005
lver	0.05	<.004	<.004	<.004	<.004
drin	0.0002	<.0002	<.0002	<.0002	<.0002
ndane	0.004	<.004	<.004	<.004	<.004
thoxychlor	0.1	<.005	<.005	<.005	<.005
xaphene	0.005	<.005	<.005	<.005	<.005
4-D	0.1	<.010	<.010	<.010	<.010
4,5-TP Silvex	0.01	<.010	<.010	<.010	<.010
dium 226, 228 pCi/l	5 pCi/l	<1.6	2.4 ± 1.2	1.2 ± 1	<1.6
ss Alpha pCi/l	15 pCi/l	<2	<2	<2	<2
ss Beta pCi/l	4 milli Rem/yr	<3	<3	<3	<3
liform Bacteria	1/100 ml	<1	<20	<5	<20

ection 265.92 (b)(1), Appendix III - EPA Interim Primary Drinking Water Standards, FR Vol. 45, No. 98, 5/19/80 33257

U. S. ENVIRONMENTAL PROTECTION AGENCY
WESTERN REGIONAL LABORATORY AND ENVIRONMENTAL CENTER
WHEELING, WEST VIRGINIA

Source: Well Sample, Citizens Complaint, WRLEC Lab #830319317E, Russel Zesiger Residence, Rt. 1, Box 15 (Basement), Receiving Stream: Ohio River, Ohio Basin, Proctor, Wetzel County, West Virginia

Grab Sample

Date	March 18, 1982
Time	1045
Temperature (Water)°C	10
pH (Field)	7.65
pH (Lab)	8.2
Acidity, mg/l	0
Alkalinity, mg/l	214
Hexavalent Chromium, µg/l	0
Ammonia-Nitrogen, mg/l	.28
Total Magnesium, mg/l	2.3
Total Sulfide, mg/l	0.00
Total Sodium, mg/l	92
Total Arsenic, µg/l	<5
Total Barium, µg/l	<100
Total Cadmium, µg/l	<10
Total Chromium, µg/l	<20
Total Iron, µg/l	55
Total Lead, µg/l	<5
Total Mercury, µg/l	<0.2
Total Nickel, µg/l	<20
Total Selenium, µg/l	<3
Total Silver, µg/l	<10
Total Vanadium, µg/l	<100
Total Zinc, µg/l	130

3/19/82

MERCURY IMPOUNDMENT
FIRST QUARTERLY MONITORING RESULTS
JANUARY 4, 1982
(Concentration in mg/l except as noted)

Parameters	EPA Maximum* Level Standard	MONITORING WELLS GM-0	GM-1	GM-2	GM-6
Arsenic	0.05	<.005	0.043	0.014	0.009
Barium	1.0	0.070	1.2	0.58	0.27
Cadmium	0.01	<.010	0.083	0.043	0.041
Chromium	0.05	<.010	0.022	0.012	0.022
Fluoride	1.4-2.4	0.8	1.4	0.7	1.2
Lead	0.05	<.010	0.031	0.018	0.016
Mercury	0.002	<.0002	0.0002	0.0002	0.0002
Nitrate (as N)	10	7.5	0.25	0.14	1.68
Selenium	0.01	<.005	<.005	<.005	<.005
Silver	0.05	<.010	<.010	<.010	<.01
Endrin	0.0002	<.0002	<.0002	<.0002	<.0002
Lindane	0.004	<.0001	<.0001	<.001	<.0001
Methoxychlor	0.1	<.003	<.003	<.003	<.003
Toxaphene	0.005	<.003	<.003	<.003	<.003
2,4-D	0.1	<.010	<.010	<.010	<.010
2,4,5-TP Silvex	0.01	<.010	<.010	<.010	<.010
Radium 226, 228 pCi/1	5 pCi/1	<0.6, <1	5.9 ±1.1, 3.1 ±1.4	<.6, <1	2.6 ±.8, 3.1 ±.2
Gross Alpha pCi/1	15 pCi/1	<2	16 ±9	<2	12 ±9
Gross Beta pCi/1	4 milli Rem/yr	<3	43 ±9	19 ±6	13 ±5
Coliform Bacteria	1/100 ml	<1	1500	500	54,000

*Section 265.92 (b)(1), Appendix III - EPA Interim Primary Drinking Water Standards, FR Vol. 45, No. 98, 5/19/80 33257